



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE)	
COMMISSION,)	
Plaintiff,)	
)	
v.)	
)	
ROGER KNOX, WINTERCAP SA)	
MICHAEL T. GASTAUER,)	
WB21 US INC., SILVERTON, SA INC.,)	Civil Action No. 18-cv-10258 (RGS)
WB21 NA INC., C CAPITAL)	
CORPORATION, WINTERCAP)	
SA INC., AND B2 CAP INC.)	
Defendants,)	
)	
RAIMUND GASTAUER, SIMONE)	
GASTAUER FOEHR, B21 LTD.,)	
SHAMAL INTERNATIONAL FZE,)	
AND WB21 DMCC,)	
Relief Defendants.)	

RULE 26(a)(1)(A) AUTOMATIC DISCLOSURE OF THE DEFENDANTS, WB21 US INC., SILVERTON SA, INC., WB21 NA, INC., C CAPITAL CORPORATION, WINTERCAP, SA INC., B2 CAP INC., AND THE RELIEF DEFENDANTS, RAIMUND GASTAUER, B21 LTD AND WB21 DMCC

Now come the Defendants, WB21 US Inc., Silverton SA, Inc., WB21 NA, Inc., C Capital Corporation, Wintercap, SA Inc., B2 Cap Inc. and the Relief Defendants, Raimund Gastauer, B21 LTD and WB21 DMCC and, pursuant to Fed. R. Civ. P. 26(a)(1)(A), make the following automatic disclosures:

A. Individuals The Defendants Or Relief Defendants May Use To Support Claims And Defenses

1. Roger Knox, a resident of France, currently in U.S. federal custody
2. Richard Targett Adams, a resident of France

3. Morrie Tobin, a resident of Los Angeles, California, who invested in publicly traded companies and engaged in pump-and-dump schemes.
4. Attorney Milan Patel, who was an Ultimate Beneficial Owner (“UBO”) or member of Sayson Capital LLC
5. Attorney Matthew Ledvina, who was a resident of Switzerland and a UBO or director of Widder Investments Inc., Sonnenberstrasse 111a, Zurich, Switzerland
6. Daniel Lacher, UBO or Director of Tobruk Consulting Inc. and Sayson Capotal LLC., also provided nominee services to Knox, Adams, Tobin, Patel and Lendwina.
7. Meinrad Lacher, UBO or Director of Mithical Holdings Ltd., 8602 Wangen b., Dubendorf, Switzerland
8. Robert Howard Harris, a UBO of Morris Capital Inc.
9. Shamal Devesh Pratap Singh, a UBO of Varese Capital Inc.
10. Andrej Jermilovs, Director and a UBO of Mergerr Ltd., UK Company Registrar No. 09902857, who received \$1.1 million USD from Wintercap entities (Varese Capital Inc., Morris Capital Inc., Riverfall Group Ltd., Hilton Capital Inc. Quezon Group LLC)
11. Justin Roger Wall, UBO of Pallercore Ltd, UK Company Registrar No. 08122932, who received \$114,500 USD from Wintercap SA
12. Jason Roger Peake, UBO and Director of Advanced Media Solutions Ltd., UK Company Registrar No 06313057, who received \$100,000 USD from Wintercap SA entity (Quezon Group LLC)
13. Craig Steven Alford, 9 Ruttan St., Thunder Bay, Ontario P7A 5C4, Canada, who received \$200,000 USD from Wintercap SA entity (Hilton Capital Inc.)
14. Dean Shah, 31 Calle Victoria Luzuriaga, Palma de Mallorca, CP07015, Spain, who received \$100,000 USD from Wintercap SA entity (Agron Capital SA)
15. Edward Thomas Clarke, 308 – 2350 Merritt Ave., Merritt, BC V1K-1B8m, Canada who received \$259,000 USD from Wintercap SA entity (Quezon Group LLC)

16. Gianni Ponzetta, Sc Cuccu 1, 73056 Taurisano, Italy, who received \$105,000 USD from Wintercap SA entity (Riverfall Group Ltd.)
17. Jassam Alkassab, 14 Street Lionsdale , North Vancouver, BC V7L 4R9, Canada, who received \$112,550 USD from Wintercap SA entity (Hilton Capital Inc.)
18. Jeffrey Piva, 7019 Gardenia Ct, Carlsbad, CA 92013, who received \$250,000 USD from Wintercap SA entity (Laramie Holdings Ltd.)
19. Kamini Aucharagram, 7 Issackhan Lane, Coromandel, Mauritius, who received \$385,000 USD from Wintercap SA entity (Corby Ventures Inc.)
20. Bozena Glowacka, Ul. Brodzinskiego 25, Warsaw, Poland 01-557, who received \$125,000 USD from Wintercap SA
21. Lynette Calang, 2B New House, Banilad Road, Cebu City, Philippines, who received \$437,000 USD from Wintercap SA entity (Egredior Holdings Ltd.)
22. Robert David King, Director of Moody's Analytics Knowledge Services (UK) Limited, UK Company Registrar No. 04590033, which received \$100,000 USD from Wintercap SA entity (Hilton Capital Inc.)
23. Raymond Dove, 7017-7 Kanou, Tomi, Naganou, Japan 389-0505, who received \$200,000 USD from Wintercap SA entity (Hilton Capital Inc.)
24. Ricardo Avila Gonzalez, 282 Parque Lefevre, Altos del Romeral, Panama, who received \$92,000 USD from Wintercap SA entity (Quezon Group LLC)
25. Shane Schmidt, 101-2190 West 8th Avenue, Vancouver BC V6K 2A4 Canada, who received \$200,000 USD from Wintercap SA
26. Sergio Alejandro Espejo Aquilar, a Mexican resident, UBO of Rison Enterprises Limited (Hong Kong), a Wintercap SA entity, Ejercito Nacional 843-B, Piso 5, Antara I Col Granada, Miguel Idalgo CD. D. DF. Mexico CP 11520
27. Sukhmohan Singh Athwal, a Canadian resident, UBO or Director of Escudo Investment Inc., a Wintercap SA entity, 2103-1383 Marinaside Cres, Vancouver BC, 6WZ 2W9

28. Gregorio Gomez Martinez, a Mexican resident, UBO or Director of Creative Lab Inc., a Wintercap SA entity, Rangele E Colima Y Mich Hab, 5ta a esm y poste 000001, pueblo nuevo ii lpz c.p. 23097 la paz, bcs
29. Robert Howard Harris, a Dominican resident, UBO or Director of Bamfield Equities Ltd., a Wintercap SA entity, Calle Interior 2DA, 30-5B, Los Restauradores, Santo Domingo de Guzman, Dominican Republic
30. Fernando Artura. De Penna Marquez, a Dominican resident, UBO or Director of Laramee Holding Ltd., a Wintercap SA entity, 38C Cigua Palmera, Don Armando, San Felipe de Puerto Plata, Puerto Plata, Dominican Republic
31. Montana Cervantes Carlos Armando, a Mexican resident, UBO or Director of Longaxel Limited, a Wintercap SA entity, Guayabos 3694 CP 45070, Arboledas, Zapopan, Jal., Mexico.
32. Axel Griva a Mexican resident, UBO or director of Tormund Consulting Inc., a Wintercap entity, General Manuel Marquez 1301-2, Interior 2-2401, Zona Rio, Tijuana, BC, C.P. 22010-cr-22001, Mexico
33. Renate Scuderi Kolliker, a Swiss resident, UBO or Director of Svarna Ltd., a Wintercap entity, Aeschweg 45, 4617 Gunzgen, Switzerland
34. Virgillio Santana Ripoll, a Dominican resident, UBO or Director of Charberlain Finnancial LLC, a Wintercap SA entity, Prol 27 de Febrero 53, Centro de la Ciudad, San Felipe de Puerto Plata, Puerto Plata, Dominican Republic. He is also a UBO of City Group Alliance Inc., which sought to intervene in this litigation, and he is also UBO of Quezon Group LLC, a Wintercap SA entity which received 14 million USD.
35. Rocio Gomez Noguez, a Mexican resident, UBO or Director of Bircher Group Ltd., a Wintercap SA entity, Poniente 4C MZ 72 LT 8 San Miguel Xico, Valle de Chalco Edo DE, Mexico
36. Harish Tak, a Mackie Research Capital Corp trader who traded Newgen securities (1075 West Georgia Street Suite 1920 Vancouver, BC - V6E 3C9)
37. Benjamin Thomas Kirk, a Canadian resident at 1214 Mission Ridge Road, Kelowna, BC, Canada, UBO or Director of Cuatro Cienagas Inversiones Ltd., a Hong Kong company with its dual registration in Canada, which sent to its own account in Canada 150,000 CAD on 2017-05-30, on 2017-03-23 sent 100,000 CAD to Norwich Real Estate Services Inc., 1553 Harvey Ave Suite

100 Kelowna, V1Y 6G1 Canada, on 2017-05-10 and 2017-05-11 transferred 1,527,926.72 CAD to Porter Ramsay LLP Trust Acc.

38. Kayley Tyne Johnson, a Canadian resident at 1214 Mission Ridge Road, Kelowna, BC, Canada, UBO or Director of Cuatro Cienagas Inversiones Ltd., a Hong Kong company with its dual registration in Canada which sent to its own account in Canada 150,000 CAD on 2017-05-30, on 2017-03-23 sent 100,000 CAD to Norwich Real Estate Services Inc., 1553 Harvey Ave Suite 100 Kelowna, V1Y 6G1 Canada, on 2017-05-10 and 2017-05-11 transferred 1,527,926.72 CAD to Porter Ramsay LLP Trust Acc.
39. Carlos Gomez Brana, a Mexican resident (address unknown), UBO or Director of Cuatro Cienagas Inversiones Ltd. (a Hong Kong company with its dual registration in Canada which sent to its own account in Canada 150,000 CAD on 2017-05-30, on 2017-03-23 sent 100,000 CAD to Norwich Real Estate Services Inc., 1553 Harvey Ave Suite 100 Kelowna, V1Y 6G1 Canada, on 2017-05-10 and 2017-05-11 transferred 1,527,926.72 CAD to Porter Ramsay LLP Trust Acc.
40. 30(b)(6) Witness of Tobruk Consulting Inc. (Marshall Island Company Registrar No. 91419)
41. 30(b)(6) Witness of Riverfall Group Ltd. (Marshall Island Company Registrar No. 87751)
42. 30(b)(6) Witness of Plutus Investments Inc. (Marshall Island Company Registrar No. 86706)
43. 30(b)(6) Witness of Mithical Holdings Ltd. (Marshall Island Company Registrar No. 42985)
44. 30(b)(6) Witness of Widder Investments Inc. (Marshall Island Company Registrar No. 42983)
45. 30(b)(6) Witness of Escudo Investment Inc. (Marshall Island Company Registrar No. 92581)
46. 30(b)(6) Witness of Creative Lab Inc. (Marshall Island Company Registrar No. 88341)
47. 30(b)(6) Witness of Laramie Holding Ltd. (Marshall Island Company Registrar No. 92297)

48. 30(b)(6) Witness of Longaxel Limited (Marshall Island Company Registrar No. 85698)
49. 30(b)(6) Witness of Varese Capital Inc. (Marshall Island Company Registrar No. 86432)
50. 30(b)(6) Witness of Tormund Consulting Inc. (Marshall Island Company Registrar No. 92474)
51. 30(b)(6) Witness of Svarna Ltd. (Marshall Island Company Registrar No. 90989).
52. 30(b)(6) Witness of Charberlain Financial LLC (Marshall Island Company Registrar No. 12062)
53. 30(b)(6) Witness of Bircher Group Ltd. (Marshall Island Company Registrar No. 89107)
54. 30(b)(6) Witness of Hilton Capital Inc.
55. 30(b)(6) Witness of Capital Mutual Services Ltd., Majuro, Trust Company Complex, Republic of Marshall Islands
56. 30(b)(6) Witness of Capital Markets Services Limited, Trust Company Complex Ajeltake Road Mh 96960 Majuro, Republic of Marshall Islands
57. 30(b)(6) Witness of Cortona Equity Inc., Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro 96960, Marshall Islands (received \$7,104,268 USD of Wintercap SA funds)
58. 30(b)(6) Witness of Bamfield Equities Ltd., Independent State of Samoa.
59. 30(b)(6) Witness of Morris Capital Inc. (Belize Company Registrar No. 110,823)
60. Sayson Capital LLC (Nevis Company Registrar No. L15887)
61. Bank of Nevis Intl (received \$3,084,070 from Wintercap SA)
62. 30(b)(6) Witness of Anaford AG, UNIT 410, 318 11TH AVE. SE, CALGARY, AB, T2G0Y2 CANADA

63. 30(b)(6) Witness of ANTRIM BALANCE MORTGAGE FUND, 9089 GLOVER ROAD, FORT LANGLEY, BC CANADA
64. 30(b)(6) Witness of Barrel Energy Inc., 14890 66A Ave, Surrey, BC V3S 0Y6, Canada
65. 30(b)(6) Witness of BGC Consultants Limited, 5331 - 4th Avenue, Delta, B.C.V4M 1G8 Canada
66. 30(b)(6) Witness of Biancardi Law Corp in Trust, 213-1455 Bellevue Avenue, West Vancouver, BC, Canada
67. 30(b)(6) Witness of Blue Ridge Ventures Inc., 1223 Pacific Drive, Delta, BC, V4M 2K2 Canada
68. 30(b)(6) Witness of Burrard Green City Builders, 143 Kanaka Road, Salt Spring Island, BC, V8K 2T5, Canada
69. 30(b)(6) Witness of Clark Wilson LLP, 900 885 West Georgia Street, Vancouver BC, V6C 3H1
70. 30(b)(6) Witness of Cuatro Cienagas Inversiones Ltd., 1214 Mission Ridge Road, Kelowna, BC, Canada (a Hong Kong company with its dual registration in Canada which sent to its own account in Canada 150,000 CAD on 2017-05-30, on 2017-03-23 sent 100,000 CAD to Norwich Real Estate Services Inc., 1553 Harvey Ave Suite 100 Kelowna, V1Y 6G1 Canada, on 2017-05-10 and 2017-05-11 transferred 1,527,926.72 CAD to Porter Ramsay LLP Trust Acc.
71. 30(b)(6) Witness of Dhanda Development Ltd., 2374 Galt Street, Vancouver BC, V5N 2Z9, Canada
72. 30(b)(6) Witness of Digatrade Ltd., 885 West Georgia Street, Suite 1500, Vancouver, BC, Canada
73. 30(b)(6) Witness of Edge Financial Management Corporation, 1002-1932 Alberni Street, Vancouver, BC V6G 1B4 Canada
74. 30(b)(6) Witness of Emerald Health Sciences Inc., Suite 200 THE LANDING, 375 WATER ST, VANCOUVER, BC V6B 0M9 Canada
75. 30(b)(6) Witness of Global Capital Partners LLC., 4526 Underwood Ave, North Vancouver, BC, Canada.

76. 30(b)(6) Witness of Greg Dureault Law., 8446 214B Street, Langley, BC, V1M 2K7, Canada
77. 30(b)(6) Witness of Hadley Mining Inc., 800-1199 West Hasting Street, Vancouver, BC V6E 3T5 Canada
78. 30(b)(6) Witness of Haywood Securities Inc., 700-200 Burrard Street, Vancouver BC Canada V6C 3L6
79. 30(b)(6) Witness of Headwind Technologies Ltd., 1778 Alberni St. Unit 401, Vancouver BC Canada
80. 30(b)(6) Witness of iBiz Media Systems, 100 Park Royal, Suite 700, West Vancouver, BC, Canada
81. 30(b)(6) Witness of Liberty One Lithium Corp., 1920 - 1177 W Hastings Street, Vancouver, BC V6E 2K3, Canada
82. 30(b)(6) Witness of McMillan LLP In Trust Acct., 1500 Royal Centre, 1055 West Georgia Street, Vancouver, BC V6E 4N7 Canada
83. 30(b)(6) Witness of Montego Resources Inc., 800 – 1199 West Hasting Street, Vancouver BC V6E 3T5 Canada
84. 30(b)(6) Witness of Norwich Real Estate Services Inc., 1553 Harvey Ave Suite 100 Kelowna, V1Y 6G1 Canada (on 2017-03-23 received 100,000 CAD from Cuatro Cienagas Inversiones Ltd., 1214 Mission Ridge Road, Kelowna, BC, Canada
85. 30(b)(6) Witness of Owen Bird Law Corporation, Suite 2900 - 595 Burrard Street, Vancouver, BC V7X 1J5, Canada
86. 30(b)(6) Witness of Porter Ramsay LLP, 200-1465 ELLIS STREET, KELOWNA, BC, Canada (on 2017-05-10 and 11 received 1,527,926.72 CAD from Cienagas Inversiones Ltd
87. 30(b)(6) Witness of Promithian Global Management Inc., 1002-1932 Alberni Street, Vancouver BC V6G 1B4 Canada
88. 30(b)(6) Witness of Round Table Farms Inc., 320-1100 Melville Street, Vancouver, BC V6E 4A6 Canada

89. 30(b)(6) Witness of Save Investments Ltd., 4438 West 10TH Ave, Suite 511, Vancouver, BC, V6R 4R8 Canada
90. 30(b)(6) Witness of StartMonday Technology Corp., Suite 1920 – 1177 West Hastings Street, Vancouver, BC V6E 2K3, Canada
91. 30(b)(6) Witness of Shapray Cramer Fitterman Lamer LLP, Suite 670-999 Canada Place, World Trade Centre, Vancouver, BC V6C 3E1 Canada
92. 30(b)(6) Witness of The Celebrated Self Initiatives Inc., 202 3020 Quebec St., Vancouver, BC Canada
93. 30(b)(6) Witness of Vancap Ventures Inc., 780 29th Ave E Vancouver B.C. V5V 0B5 Canada
94. 30(b)(6) Witness of Advent Enterprises LLC, 38 Sanford Drive Randolph NJ 07869 USA
95. 30(b)(6) Witness of ARC Development Group Inc., 8 The Green, Suite 6553, Dover, DE 19901 USA
96. 30(b)(6) Witness of Arch Therapeutics Inc, 235 Walnut Street, Suite 6, Framingham MA 01702 USA
97. 30(b)(6) Witness of Build All Construction, Suite A-190, 7500 W. Mississippi Ave, Lakewood, Colorado 80226 USA
98. 30(b)(6) Witness of EIJ Inc., 341 North Canon Drive, Beverly Hills, CA 90210, USA (received \$2,555,389 USD from Wintercap SA)
99. 30(b)(6) Witness of FinnCom Inc., 2010 West Avenue K, #623 Lancaster, CA 93536.
100. 30(b)(6) Witness of Full Service Media LLC., 1802 Park Green Way, Pasadena, MD 21122
101. 30(b)(6) Witness of Golenbock Eiseman Assor Bell & Peskoe LLP, 437 Madison Ave, New York, NY 10022
102. 30(b)(6) Witness of GMG Motors Inc., 5090 Kearny Mesa Road, San Diego CA 92111

103. 30(b)(6) Witness of Investing Media Solutions LLC., 180 N Stetson Ave Suite 3500 Chicago IL 60601
104. 30(b)(6) Witness of Issuer Direct Corporation, 500 Perimeter Park Drive, Suite D, Morrisville, NC 27560
105. 30(b)(6) Witness of Khaos Media Group LLC., 3922 Main St, Dallas, TX
106. 30(b)(6) Witness of Large Investment Group Inc., 15991 Red Hill #220, Tustin, CA 92780
107. 30(b)(6) Witness of Marzany Inc., 9120 Double Diamond Pkwy, Suite 6275, Reno NV 89521
108. 30(b)(6) Witness of Midam Ventures LLC., 1501 Venera Ave Suite 225, Coral Gables, FL 33146
109. 30(b)(6) Witness of MKM Capital Advisors LLC., 1410 Broadway 23F New York NY 10017
110. 30(b)(6) Witness of Mobius Biotechnology Inc., 16541 Redmond Way, Redmond, WA 98052
111. 30(b)(6) Witness of MRE Investment Group LLC., 5200 East Smith Road, Denver, CO 80239
112. 30(b)(6) Witness of Neoventive LLC., 1220 Crummell Avenue Annapolis MD 21403
113. 30(b)(6) Witness of NewGen Biopharma Corp., 701 S Carson St Ste 200, Carson, NV 89701
114. 30(b)(6) Witness of Nexus Biopharma Inc., 8 Hillside Ave, Suite 108, Montclair NJ 07042
115. 30(b)(6) Witness of Peckar & Abramson PC, 41 Madison Ave 20F New York NY 10010 USA
116. 30(b)(6) Witness of Plateau Ventures LLC., 2250 Old City Park Road, Moab, UT USA

117. 30(b)(6) Witness of Reformation Services LLC., 5348 Vegas Drive, Suite 688, Las Vegas NV 89108
118. 30(b)(6) Witness of Securities Counselors Inc. Escrow Account, 133 Sprucewood Deerfield Illinois 60015
119. 30(b)(6) Witness of Sencha Corporation, 30 N. Gould St., Suite 4225, Sheridan, WY. 82801
120. 30(b)(6) Witness of SLS Wire Clearing, SPECIALIZED LOAN SERVICING LLC 8742 Lucent Blvd, Suite 300 Highlands Ranch, CO 80129
121. 30(b)(6) Witness of Specialized Loan Servicing LLC, PO Box 636005, Littleton CO 80163-6005
122. 30(b)(6) Witness of Stevia First Corp., 5225 Carlson Rd., Yuba City, CA 95993
123. 30(b)(6) Witness of Vektor Vodka LLC., #2, 447 W. Watkins Road, Phoenix, AZ
124. 30(b)(6) Witness of Vitality Biopharma Inc., 5225 Carlson Road Yuba City CA 95993
125. 30(b)(6) Witness of Zena Capital LLC, 1501 Bradford View Drive, Cary, NC
126. 30(b)(6) Witness of Antevorta Capital Partners Ltd., Wickham Cay Plaza, Road Town, Tortola, BVI (received \$7,764,518 USD from Wintercap SA)
127. 30(b)(6) Witness of 12 Hong Kong Limited, Unit B, 22/F, Times Centre, 391-407 Jaffe Road, Wanchai, Hong Kong
128. 30(b)(6) Witness of Digital Solutions Ltd., 15/F Blk A Hiller Comm Bldg, 65-67 Bornham Stand Street, Sheung Wan, Hong Kong
129. 30(b)(6) Witness of Ipaydna International Ltd., 3F Shun Feng International Centre, 182 Queens Road East, Wanchai, Hong Kong
130. 30(b)(6) Witness of Island Fortune Global Limited, Unit 1010, 10/F, Mirimar Tower, 132 Nathan Road, Tsim Sha Tsui, Kowloon, Hong Kong

131. 30(b)(6) Witness of Kelson International Limited, 10/F, St Johns Building, 33 Garden Road, Hong Kong
132. 30(b)(6) Witness of Right Power Services Limited, Room 2206, Tin Lok House, Shun Tin Estate, Kwun Tong, Hong Kong
133. 30(b)(6) Witness of Sim Conferences Limited, 5/F Yat Chau Building, 262 Des Voeux Road Central, Hong Kong
134. 30(b)(6) Witness of Viveka Limited, 5F, Yat Chau Building, 262 Des Voeux Road, Hong Kong
135. 30(b)(6) Witness of Cuatro Cienagas Inversiones Ltd. (incorporation address unknown, dual registration address in Canada is 1214 Mission Ridge Road, Kelowna, BC, Canada)
136. 30(b)(6) Witness of Bravo Alpha International Industries Inc., 405 Bormaheco Exec Suites, Suez St Makati City, Philippines
137. 30(b)(6) Witness of Juppier Corporation, Pavillion 11B BerthaPhil Clark Center, J. Abad Santos Ave. Clarkfield Pampanga, Philippines 2023
138. 30(b)(6) Witness of NCW Horizons Group Inc., 37F LKG Tower, 6801 Ayala Ave, Makati, Metro Manila, Philippines
139. 30(b)(6) Witness of Paragon WebMedia Solutions Inc., Villa Angela Arcade, Burgos Circumferential Road, Bacolod City, 6100 Philippines
140. 30(b)(6) Witness of Pentagon Int'l Shipping Services Inc., 4581 Baron Street Makati City Philippines
141. 30(b)(6) Witness of Pyronix Media Corp., Blk 13, Lot 2, Santorini Eoreco Brgy, Mandalagan, Bacolod City, Philippines (received \$5,161,862 USD from Wintercap SA)
142. 30(b)(6) Witness of Reso-Or Law Office, Unit 909, Apple One, Equicom Twr, Mindanao Ave, Biliran Rd, Cebu Park, Cebu, Philippines (received \$4,260,011 USD from Wintercap SA)
143. 30(b)(6) Witness of Speedfast Industries Inc., 405 Bormaheco Exec Suites, Suez, St Makati City, Philippines

144. 30(b)(6) Witness of Brapel Constructores S.A. de C.V, Calle Joaquín Moreno 119 A, Col. Centro, Del. Torreon, Torreon, Coahuila, Mexico CP 27000
145. 30(b)(6) Witness of Bufet Corporativo y Aduanero S.A. de C.V., CALLE GONZALEZ ORTEGA 779, INT. 9 COL. CENTRO TORREON, COAHUILA, MEXICO 27000
146. 30(b)(6) Witness of Comercializadora Anairda S.A. de C.V., Calle Joaquin Moreno 119, Int. A Col. Centro, Torreon, Coahuila, 27000. Mexico
147. 30(b)(6) Witness of El Quinto Poder SA de CV., Avenida de Los Charros 606, Col. Centro, Cabo San Lucas, Baja California Sur, Mexico CP23450 (received \$2,257,583 USD from Wintercap SA)
148. 30(b)(6) Witness of Estructura Internacional de la Construcccion SA de CV., Calle Joaquin Moreno #119, Int. A, Col. Centro, Torreon, Coahuila, Mexico
149. 30(b)(6) Witness of Fuze Construcciones SA de CV., AV. Morelos OTE #2324 Col. Centro, Torreon, Coahuila, MEXICO
150. 30(b)(6) Witness of GPO KEDRET SA de CV., Avenida Ixcamilpa 477, Col. Valle Oriente, Del. Torreon, Torreon, Coahuila, MEXICO, POSTAL CODE 27277
151. 30(b)(6) Witness of Mantenimiento Mecanico Lenox S.A. de C.V., Av. Gonzalez Ortega 779, Col. Centro, Torreon, Coahuila, Mexico CP 27000
152. 30(b)(6) Witness of Ojorm Administrativos SA de CV., Calle Prado Sur 274, Col. Lomas de Chapultepec, VI Sección, Miguel Hidalgo, Ciudad de Mexico, Mexico
153. 30(b)(6) Witness of Promotora Prixom SP., Calle Poniente 126 417 Int 2 Col Nueva Vallejo Del. Gustavo Madero, Mexico DF, Mexico (received \$3,372,366 USD from Wintercap SA)
154. 30(b)(6) Witness of Servicios de Limpieza Datop SA de CV., Calle Pedro Moreno 303, Col. Lopez Mateos, Nuevo Leon, Mexico
155. 30(b)(6) Witness of Servicios Mursatec SA de CV., Avenida Allende 649 OTE, Col. Centro, Torreon, Coahuila, 27000, Mexico

156. 30(b)(6) Witness of Sierra de Bernia SA de CV., The Fives, Acceso Xcalacoco, Mexico
157. 30(b)(6) Witness of Transformaciones y Servicios Industriales, Avda Insurgentes Sur 1602, Piso 4, Int 32, Del Benito Juarez, Mexico City 03900 Mexico
158. 30(b)(6) Witness of Via Signature S.A. De C.V., Mision de San Javier No. 10643, Zona Urbana Rio Tijuana, Postal Code 22010 Mexico
159. 30(b)(6) Witness of Arbutus Holdings Ltd., 2 Spinola Road, St Julians, Malta STJ3014
160. 30(b)(6) Witness of Solv International Ltd., 2 Spinola Road, St Julians, Malta STJ3014
161. 30(b)(6) Witness of Dari International Ltd., The Dome Tower, Office 1801 Cluster N, Jumeirah Lakes Tower, Dubai, United Arab Emirates (received \$2,692,005 USD from Wintercap SA)
162. 30(b)(6) Witness of Index & Cie Limited Client Money Account, Index, DIFC, PO 507 069, Dubai, United Arab Emirates
163. 30(b)(6) Witness of Quantum Solutions DWC LLC., The Dome Tower, Office 1801, Cluster N, Jumeirah Lakes Towers, Dubai, United Arab Emirates
164. 30(b)(6) Witness of Frodo Inc., 501 St. James Court, St. Denis Street, Port-Louis, Mauritius
165. 30(b)(6) Witness of Global Fidelity Bank Ltd., 67 Fort Street, Artemis House 1st Floor, George Town, Grand Cayman, Cayman Islands
166. 30(b)(6) Witness of Gryphon Holdings, 3rd Floor, 1 Capital Place, George Town, Cayman Island KY1-1002
167. 30(b)(6) Witness of Leidys Barrios Barona, Avenida Cra 68 #1A-55, Bogota, Colombia
168. 30(b)(6) Witness of Lia Sepulveda Salazar, Carrera 40 #71 Sur 15 Sabaneta, Colombia 055450
169. 30(b)(6) Witness of Lion State Capital Pte. Ltd., 20A Circular Road, Singapore 049376

170. 30(b)(6) Witness of Pacific Asia Capital Pte. Ltd., 60 Paya Lebar Road 12-55, Singapore 409051
171. 30(b)(6) Witness of NG Mobile Systems Sarl, 55 Rue De la Liberation, L-3511 Dedelange, Luxembourg
172. 30(b)(6) Witness of Panamerica Consulting Inc., Avenida Cuba y Calle 30, Caledonia Edificio Policento, Quinto Piso, Panama
173. 30(b)(6) Witness of Sargon Finance SA, ADR Building, Samel Lewis Ave, Panama City, Panama
174. 30(b)(6) Witness of Rydax Limited, Suite 13, First Floor, Oliaji Trade Centre, Francis Street, Victoria, Mahe, Seychelles
175. 30(b)(6) Witness of Seton Securities Int'l Ltd. Lyford Cay House, 1st Floor, Lyford Cay, Nassau, Bahamas
176. 30(b)(6) Witness of Sharework GmbH., Hamburger StraBe 3, D-22083 Hamburg, Germany
177. 30(b)(6) Witness of Standard Associates GMBH., Baseler StraÙe 46-48, 60329 Frankfurt am Main, Germany
178. 30(b)(6) Witness of Stevva Ltd., Nikolaou Basiliadi 13 Greece, Pella Giannista 581000, Greece
179. 30(b)(6) Witness of Toprank Co., LTD., 1-3-3-2F, Shainkawa Chuo-ke, Tokyo 104-0033 Japan
180. 30(b)(6) Witness of Worldclear Management Ltd., 48 Ward St, Hamilton, Waikato 3204 New Zealand
181. 30(b)(6) Witness of Wedbush Securities, Inc. (United States), 1000 Wilshire Blvd, Los Angeles, CA 90017
182. 30(b)(6) Witness of Forte Securities, LLC (United States), 12 East 49th Street, 17th Floor--Room 113, New York, NY 10017
183. 30(b)(6) Witness of Lombard Forte Securities, Ltd. (United Arab Emirates), DIFC Currency House Level 2 Office 201, Tower 1 P.O. Box: 482097 Dubai, U.A.E.

184. 30(b)(6) Witness of Prometheus Capital Finance, Ltd. (United Arab Emirates), Unit N502, Level 5, Emirates Financial Towers, Dubai International Financial Centre, Dubai, 65909, United Arab Emirates
185. 30(b)(6) Witness of Tendall Capital Markets, Ltd. (Malta), 12, Tigne Place, Of 2/5, Tigne Street, SLM 3173, Sliema
186. 30(b)(6) Witness of Forte Securities, Ltd. (United Kingdom), Golden House, 30 Great Pulteney Street, London, England, W1F 9NN
187. 30(b)(6) Witness of Valbury Capital, Ltd. (United Kingdom), 5 Market Yard Mews, 194-204 Bermondsey Street, London, United Kingdom, SE1 3TQ
188. 30(b)(6) Witness of Linear Investments, Ltd. (United Kingdom), 8-10 Grosvenor Gardens, London, SW1W 0DH
189. 30(b)(6) Witness of ADM Investor Services, Ltd. (United Kingdom), 4th Floor, Millennium Bridge House, 2 Lambeth Hill, London, EC4V 3TT
190. 30(b)(6) Witness of Interactive Brokers UK, Ltd. (United Kingdom), Level 20 Heron Tower, 110 Bishopsgate, London, EC2N 4A.

B. Description Of Documents And Other Information That The Defendants May Use To Support Defenses

1. WB21 PTE Account statements, transaction records, account agreements and account opening documents for the following individuals/entities:
 - a. Agron Capital SA
 - b. Antevorta Capital Partners Ltd.
 - c. Armor Securities LLC
 - d. Ballis Holdings LLC
 - e. Bamfield Equities Ltd
 - f. Bayview Equities Ltd
 - g. Bircher Group Ltd
 - h. Carrera Capital Ltd
 - i. Castle Keep Ltd
 - j. Chamberlain Financial LLC
 - k. Charterhouse Capital Inc
 - l. City Group Alliance Inc
 - m. Clear View Trading Corp

- n. Compton Capital Ltd.
- o. Corby Ventures Ltd
- p. Corelli Capital AG
- q. Creative Lab Inc.
- r. Cuatro Cienagas Inversiones Ltd.
- s. Dean Shah
- t. Deus Ventures LLC
- u. Egredior Holdings Ltd.
- v. Escudo Investment Inc
- w. Garsdale Corp.
- x. Glen Clova Holdings Ltd.
- y. Gotama Capital SA
- z. Hampton Partners Inc
- aa. Healthiness Ltd.
- bb. Hilton Capital Inc.
- cc. Holyrood Capital Ltd.
- dd. Inland Trading Ltd.
- ee. Josephine Allen
- ff. Laramie Holdings Ltd.
- gg. Longaxel Limited
- hh. Michael Barclay
- ii. Miguel Robles Hiraldo
- jj. Mithical Holdings Ltd.
- kk. Morris Capital Inc.
- ll. Murray Capital Corp.
- mm. Nerima Capital SA
- nn. Ophir Investments LLC
- oo. Pampas Capital Ltd.
- pp. Peter Frost
- qq. Plutus Investments Inc.
- rr. Quarry Bay Capital SA
- ss. Queens Gate Capital Ltd.
- tt. Quezon Group LLC
- uu. Quilmes Capital SA
- vv. Redfern Investors Ltd.
- ww. Richard Targett-Adams
- xx. Rison Enterprises Ltd.
- yy. Riverfall Group Ltd
- zz. Roger Knox
- aaa. Santos Torres LLC
- bbb. Sargon Finance SA
- ccc. Sayson Capital LLC
- ddd. Shirley Boodoosingh

eee. Silverton SA
fff. Svarna Ltd
ggg. Tobruk Consulting Inc
hhh. Varese Capital Ltd.
iii. Widder Investments Inc.
jjj. Wintercap SA

2. Correspondence and emails with Roger Knox, Wintercap SA, Silverton, SA, as well as their agents and attorneys.

Respectfully submitted,
WB21 US Inc., Silverton SA, Inc.
WB21 NA, Inc., C Capital Corporation
Wintercap SA Inc., B2 Cap Inc.,
Raimund Gastauer, B21 LTD,
WB21 DMCC
By their attorneys,

/s/ Timothy Cornell
Timothy Cornell (BBO #654412)
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DATE: August 16, 2019

Certificate of Service

I certify that this automatic disclosure will be served upon counsel for the SEC via email on this 16th day of August, 2019.

/s/ Timothy Cornell